

AO91 (Rev. 12/03) Criminal Complaint

**FILED****UNITED STATES DISTRICT COURT**

January 29, 2025

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXASWESTERN DISTRICT OF TEXAS, EL PASO DIVISIONBY: Erika Gonzalez

DEPUTY

**UNITED STATES OF AMERICA****CRIMINAL COMPLAINT****V.**

Neri Jose ALVARADO Borges

**Case Number: EP-25-M-397-RFC**

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 04/01/2024 in El Paso County, in the Western District Of Texas defendant(s) did, being an alien to the United States, knowingly enter and attempt to enter the United States at a time and place other than as designated by immigration officers.

in violation of Title 8 United States Code, Section(s) 1325(a)(1)

I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:

The DEFENDANT, Neri Jose ALVARADO Borges, an alien to the United States and a citizen of Mexico, entered the United States from the Republic of Mexico by wading the Rio Grande River on April 01, 2024, approximately 1 mile east of the Paso Del Norte Port of Entry in El Paso, Texas, in the Western District of Texas. The place where the DEFENDANT entered is not designated as a Port of Entry by immigration officers.

Continued on the attached sheet and made a part hereof:

☒ Yes ☐ No**Complaint sworn to telephonically on**January 29, 2025 at 01:05 PM and signed **electronically. FED.R.CRIM.P. 4.1(b)(2)(A)**

Sworn to before me and subscribed in my presence,

01/29/2025

Date

Robert F. Castaneda

Name &amp; Title of Judicial Officer

U.S. Magistrate Judge

at

El Paso, TX

City/State

M.F. Martinez  
Signature of Judicial OfficerRoberto Cenicerros  
Signature of ComplainantRoberto Cenicerros

Printed Name of Complainant

CONTINUATION OF CRIMINAL COMPLAINT

WESTERN DISTRICT OF TEXAS

Neri Jose ALVARADO Borges

PEPT#

01/29/2025

FACTS (CONTINUED)

Because this affidavit is being submitted for the limited purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.

Immigration History:

NONE

Criminal History:

NONE